

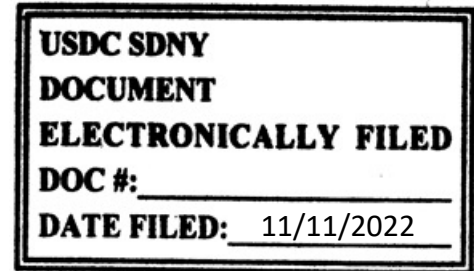
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November 10, 2022

VIA ECF

The Honorable Stewart D. Aaron
United States Magistrate Judge
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, NY 10007
United States of America



Re: *Allianz Global Investors GmbH, et al., v. Bank of America Corp., et al.*, 1:18-cv-10364

Dear Judge Aaron:

We write with respect to the Court's November 5, 2022 order requiring Plaintiff The California State Teachers' Retirement System ("CalSTRS") to serve a declaration on Defendants by November 11, 2022, regarding FX trading conducted by certain of CalSTRS' third-party asset managers during the relevant period. ECF No. 1195.

After the Court's order, one of CalSTRS' former external managers finally responded to our multiple emails and indicated a willingness to talk to us. Additionally, CalSTRS was able to locate contact information for a general recordkeeping contact at another former external manager, and we are attempting to establish a dialogue. Despite our diligent efforts, it is unlikely that any information from these former managers will be forthcoming by tomorrow. Because CalSTRS would like to include information from these external asset managers in its declaration, and Defendants would presumably want the declaration to include as much information as is reasonably available, we respectfully request a modest extension to the Court's deadline to provide the declaration to Defendants.

While we will push to obtain any additional information from these managers as quickly as possible, and would otherwise propose a two-week extension, that would fall during the Thanksgiving holiday. We thus request an extension to November 30, with the understanding that we will serve the declaration sooner if our discussions with the two former managers have run their course before then.

Defendants have indicated that they oppose the requested extension and instead propose that CalSTRS serve one declaration tomorrow and another, supplemental declaration in the future containing any additional information CalSTRS is able to obtain from the two former managers. Preparing and serving multiple declarations makes no sense, is inefficient, and causes unnecessary business interruption. Defendants have already agreed that a supplemental CalSTRS' 30(b)(6) deposition could take place [REDACTED] in mid-December or later if such a deposition is still justified in light of the declaration. There is thus no conceivable prejudice to Defendants in receiving one declaration by November 30, as opposed to two declarations by November 30. The parties will still have ample time to meet and confer and present any dispute to the Court, particularly given that Defendants' expert reports are not due until *nine months* from now, in August 2023. ECF No. 1186. CalSTRS' request for a modest extension until after the Thanksgiving holiday should thus be granted.

Respectfully submitted,

By: /s/ Daniel L. Brockett

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Counsel for Plaintiffs

CalSTRS' Letter Motion is GRANTED IN PART and DENIED IN PART. The deadline for CalSTRS to provide to Defendants a declaration containing additional information regarding the non-CMP external managers trades hereby is extended from today (*i.e.*, Veterans Day, a federal holiday on which the Court is closed) to Wednesday, 11/16/2022. It is the Court's present intention to further extend the deadline to November 30, 2022 (*i.e.*, the date requested by CalSTRS), due to the apparent lack of prejudice to Defendants, unless Defendants show cause in a writing filed to the ECF docket by 12 noon EST on Monday, 11/14/2022, why an earlier deadline should be set.

SO ORDERED.

Dated: 11/11/2022

A handwritten signature in blue ink, appearing to read "Stuart J. Aaron".